5/17/94

LETTER REPORT
FOR
FORD MOTOR COMPANY/ALLEN PARK
ALLEN PARK, WAYNE COUNTY, MICHIGAN
TDD# T05-9404-027
PAN: EMI0249RAA
DOCUMENT CONTROL NO.: TAT-05-25-04060

I.1

MAY 17, 1994

Prepared For:
Ms. Gail Nabasny
Deputy Project Officer
Emergency and Enforcement Response Branch
Emergency Support Section
U.S. EPA Region V

Contract No.: 68-WO-0037

Project Manager: _____ Date: 5/17/94

Prepared By: _____ Date: 5/17/94

Reviewed By: _____ Date: 5/22/94

Approved By: _____ Date: 5-17-94

May 17, 1994

Ms. Gail Nabasny
Deputy Project Officer
Emergency Support Section
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604

Re: Ford Motor Company/Allen Park
Allen Park, Wayne County, Michigan
TDD # T05-9404-027
PAN EMI0249RAA

Dear Ms. Nabasny:

On April 20, 1994, the United States Environmental Protection Agency (U.S. EPA) tasked the Ecology and Environment, Inc., Technical Assistance Team (TAT) to develop a site safety plan; perform oversight at a potentially responsible party (PRP) removal action, including photodocumentation; and prepare a letter report regarding site activities under Technical Directive Document (TDD) Number T05-9404-027. The TAT members responding were Herbert Langer and James Sugarman. This letter report summarizes these activities.

The Ford Motor Company/Allen Park site is formally described as the Engine Manufacturing Development Operation (EMDO) and is located at 17000 Southfield Road in Allen Park, Wayne County, Michigan (Figure 1). The Reeck Drain is a drainage ditch that runs from the northwest, through the site and under the facility through three culverts. After passing under the facility the drain continues in an easterly direction and eventually converges with the north branch of the Ecorse River (Figure 2). On Monday morning April 18, 1994, On-Scene Coordinator (OSC) Rose Ellison responded to a National Response Center (NRC) report of an oil spill at the EMDO site.

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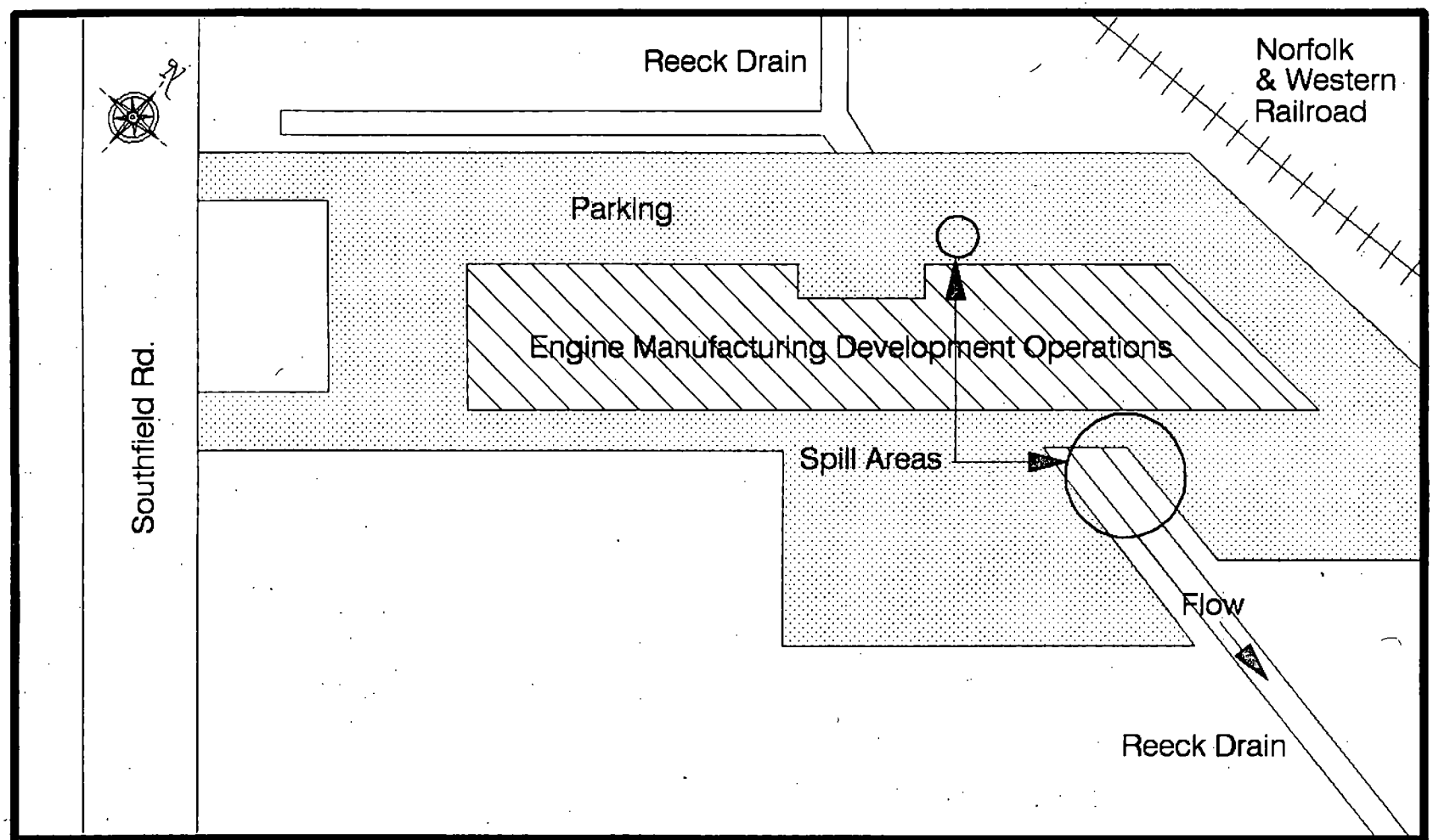
Technical Assistance Team
Region V

TITLE: Site Location Map	FIGURE #: 1
SITE: Ford/Allen Park	SCALE: 1:20,000
SOURCE/DATE: USGS 7.5 Minute Series (Topographic) Quadrangle, April 28, 1994	CITY: Allen Park; STATE: Michigan; TDD #: T05-9404-027



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Region V

TITLE: Site Feature Map		FIGURE #: 2
SITE: Ford/Allen Park		SCALE: None
SOURCE/DATE: E and E, Inc. / April 27, 1994	CITY: Allen Park STATE: Michigan	TDD #: T05-9404-027

OSC Ellison met with EMDO personnel who were addressing the reported oil spill at the facility. While OSC Ellison was inspecting the site, she observed a colored plume in the Reeck Drain of an unknown material. Since the Reeck Drain eventually empties into the north branch of the Ecorse River, contamination of the river was possible. Investigation by EMDO personnel revealed that the material in the drain was a floor wax stripping compound used by the facility's maintenance contractor. The contractor had not been able to dispose of the waste through the internal site sanitary drain system and had instead poured it out in the parking areas north and south of the building.

The material then flowed across the parking areas and through storm drains into the Reeck Drain. The OSC and EMDO personnel tested the pH of the spilled material, contaminated water, and contaminated soil. The pH of the material, water, and soil were all elevated above the expected range. The Material Safety Data Sheet for the material reported that its pH was above thirteen. The EMDO deployed booms around the spilled material to help prevent it from moving downstream. The compound was water soluble so the booms had limited effect. All personnel then ceased activities until a contractor could be mobilized to clean-up the spilled material and contaminated areas.

On April 19, 1994, TAT member (TATM) Herb Langer was mobilized to review the EMDO's Spill Prevention Control and Countermeasure (SPCC) plan. The site has a 10,000 gallon unleaded fuel tank, a 12,000 gallon waste oil tank, and a 3000 gallon test coolant tank. The tanks are all below ground, double walled, and have contained material level sensors. The total underground capacity of all tanks is 25,000 gallons. There is also a small shed east of the facility that is used for short term drum storage. Drums placed in this shed are removed within three days and the containment area around the drums drains into the waste oil tank. Minimum individual tank storage capacities that require a facility to maintain an SPCC plan are 42,000 gallons for below ground storage tanks and 660 gallons for above ground storage tanks. While the EMDO facility does not meet the storage capacity to require a SPCC plan, they do maintain one.

After review of the SPCC plan by the TATM and inspection of the site by the OSC and site personnel, a meeting was held to discuss actions to be taken regarding the spill. Comments regarding the SPCC plan were provided by the TATM at this time. In attendance at the meeting were Turner (Bud) Dorton, Jim Head, and Bill Kocsis of EMDO; Rose Ellison of the U.S. EPA; and Herbert Langer of the TAT. The EMDO had already contacted their clean-up contractors and were expecting them on site early the following day, April 20, 1994. The contractor had been directed to temporarily stop the flow of the drain, remove the contaminated water and sediment, remove the contaminated soils from the banks of the drain, and properly dispose of the contaminated water,

stored on site; better define locations and types of spill prevention equipment; and update and correctly list U.S. EPA emergency phone numbers. The TATM also noted that the professional engineer review of the plan should be renewed in October of 1994.

On April 20,1994, TATMs Langer and James Sugarman arrived on site to perform oversight of the clean-up activities. Upon arrival, the TATMs met with Bill Kocsis of EMDO who escorted them to the work area. The clean-up contractor for the activity was Vac-All (26705 Northline, Taylor, Michigan). The Vac-All representative in charge of the activities was Curt Spicer. Bud Dorton of the EMDO arrived in the work area soon after the TAT's arrival. Vac-All personnel had diked the drain north of the building to reduce water flow and had begun manually digging sediments from the drain and placing them in drums. After viewing operations, the TAT suggested that the contaminated sediments be transported over soils already contaminated to avoid migration of contamination to clean soil. Mr. Dorton implemented this recommendation.

Gary Molchan of McNamee Industrial Services (3131 South State Street/Suite 300, Ann Arbor, Michigan) arrived on site to act as EMDO's clean-up oversight contractor. Mr. Molchan suggested that the drain flow be completely stopped by diking the drain north of the facility with sand bags. This action was implemented and allowed the use of a vac-truck to transfer water from the drain to a tanker truck for storage. Mr. Molchan met with the local Department of Public Works (DPW) to determine if the water could be discharged into the sanitary sewer system. The TAT suggested that the approval to discharge be received in written form and delivered to the OSC. At 1500 hours TATM Langer departed the site and TATM Sugarman remained to observe site activity. Once verbally approved by the DPW, Vac-All began discharge of the water from the tanker truck into the sanitary sewer system. The TAT used pH strips to check of the alkalinity of the stored water and sediment. The pH of the water and sediments was found to be between 7 and 8. John Kozuh (DPW representative) arrived on site to inspect site activities and evaluate the situation regarding the spill.

After the Reeck Drain was diked and the downstream water removed, Vac-All personnel resumed removing visually stained soils and sediments using shovels and a vac-truck capable of collecting solids. This vac-truck collected contaminated drain sediments and soils from the drain's embankment. All of the visibly contaminated soil on the embankment was removed. The soil was removed to a depth of three inches below the surface. Soils and sediments manually removed were placed in drums. Soils and sediments removed using the vac-truck were stored in its tank. Washing of the concrete culverts that carry the drain under the facility was performed using a spray wash instrument called a "Jet-Rodder". Water and mud generated by the cleaning operation

were also pumped into the vac-truck. The TAT continued to test soil and water pH; the levels remained between 7 and 8. Vac-All continued to discharge water from the cleaning activities to the sanitary sewer system. After completion of washing the three culverts, site activities were suspended for the day.

On April 21, 1994, TATM Sugarman returned to the site. Vac-All was continuing the slow release of water from the tanker truck into the sanitary sewer system. Testing of the water pH showed that it was still approximately 7. Envotech representatives arrived on site to collect two soil and four sediment samples for analysis. TATM Sugarman pointed out stained soil that had not been collected to EMDO personnel. These soils were collected using the solid vac-truck. Fresh soil, sand, and gravel were delivered to the site for use in the reclamation of the affected areas.

On April 22, 1994, TATM Sugarman returned to the site to review the activities of the day. The sand bag dike had been removed to allow the Reeck Drain to flow. The top soil brought on site was used to fill the areas where the contaminated soils had been excavated and sod was then placed over the soil. The sand was spread across the portion of Reeck Drain where sediments had been removed. The gravel was used to repair portions of the parking area. Contaminated soils were stored on-site in the vac-truck tanks until disposal approval could be arranged. On May 4, 1994, Bud Dorton verbally notified the TAT that the soils had been sent to Michigan Disposal in Romulus, Michigan, for landfill.

This completed the TAT activities at the site. The report generated by the TAT's SPCC inspection is attached, as is the site photo log. Follow-up regarding the site will be performed as directed by the OSC. Please contact this office should any additional information on this site be needed.

Sincerely,

Herbert B. Langer
TAT Member

Sandra L. Basham
Assistant TAT Leader

cc: Rose Ellison, OSC

Attachments

A

Site: Ford/Allen Park
Photo No: 1
Direction: North
Camera: Olympus 35mm

Date: 4/20/94
Photographer: Langer
Subject: Stained soils where contamination material flowed over soils into Reeck Drain

Site: Ford/Allen Park
Photo No: 2
Direction: East
Camera: Olympus 35mm

Date: 4/20/94
Photographer: Langer
Subject: Original diking to slow water flowing into contaminated area.

Site: Ford/Allen Park
Photo No: 3
Direction: North
Camera: Olympus 35mm

Date: 4/20/94
Photographer: Langer
Subject: Vac-All worker digging out contaminated sediment from the Reeck Drain.

Site: Ford/Allen Park
Photo No: 4
Direction: West
Camera: Olympus 35mm

Date: 4/20/94
Photographer: Sugarman
Subject: New dike placed to prevent all water flow into the contaminated area.

Site: Ford/Allen Park
Photo No: 5
Direction: East
Camera: Olympus 35mm

Date: 4/20/94
Photographer: Sugarman
Subject: Water being pumped out of contaminated area so that sediments can be removed.

Site: Ford/Allen Park
Photo No: 6
Direction: North
Camera: Olympus 35mm

Date: 4/20/94
Photographer: Sugarman
Subject: Contaminated sediments being pumped out using the solids vac-truck.

Site: Ford/Allen Park
Photo No: 7
Direction: East
Camera: Olympus 35mm

Date: 4/21/94
Photographer: Sugarman
Subject: Envotech personnel collecting samples of the contaminated soils.

Site: Ford/Allen Park
Photo No: 8
Direction: West
Camera: Olympus 35mm

Date: 4/21/94
Photographer: Sugarman
Subject: Contaminated soils being collected using the solids vac-truck.

Site: Ford/Allen Park
Photo No: 9
Direction: East
Camera: Olympus 35mm

Date: 4/21/94
Photographer: Sugarman
Subject: Topsoil and sand brought to replace soils and sediments removed for disposal.

Site: Ford/Allen Park
Photo No: 10
Direction: North
Camera: Olympus 35mm

Date: 4/22/94
Photographer: Sugarman
Subject: Contamination area after replacement of sediment, top soil, and sod.

A. SPCC FIELD SHEET
(To be completed if SPCC Regulation is applicable to Facility - See 40 CFR 112.1)

1a. NAME OF FACILITY Ford Motor Company, Engine Manufacturing Development Operation	1b. TYPE OF FACILITY Manufacturing Research
1c. FACILITY LOCATION 17000 Southfield Road, Allen Park, Michigan 48101	
2a. NAME OF OWNER AND/OR OPERATOR RESPONSIBLE FOR FACILITY James Head	2b. TELEPHONE NUMBER 313-322-7114
2c. MAILING ADDRESS Same as Above	
3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE (SEE ATTACHED PAGE)	
4. IS A CERTIFIED SPCC PLAN AVAILABLE FOR INSPECTION? [X] YES [ ] NO	5. DATE OF INSPECTION April 19, 1994
6. NAME AND REGISTRATION NUMBER OF CERTIFYING ENGINEER [ ] NOT AVAILABLE Hakim Shakir 24064 Michigan Certification	7. DATE SPCC PLAN WAS CERTIFIED [ ] NOT AVAILABLE October 22, 1991
8. IS THE SPCC PLAN FULLY IMPLEMENTED? [X] YES [ ] NO [ ] NOT APPLICABLE	
9. NAME OF WATER BODY THAT POTENTIAL SPILL COULD ENTER: OR IF UNNAMED TRIBUTARY, THEN FIRST WATERBODY DOWNSTREAM Reeck Drain which eventually empties into the North Branch Of the Ecorse River.	
10. COMMENTS (SEE ATTACHED PAGE)	

11a. SPCC NO.	11b. CASE NO.	11c. NPDES NO. [ ] NOT AVAILABLE
12a. INSPECTOR (sign)		12b. DATE 5/21/94
12c. INSPECTOR (print) Herbert Langer		

B. SPCC INSPECTION SUMMARY SHEET

SPCC NO.	CASE NO.	DATE OF INSPECTION April 19, 1994
NAME OF INSPECTOR (signature)		DATE OF DOCUMENTATION REPORT 5/4/94
NAME OF INSPECTOR (print) Herbert Langer		NPDES NO.

1. FACILITY

a. COMPANY
Ford Motor Company

ADDRESS		TELEPHONE
17000 Southfield Road		313-322-7114
CITY Allen Park	STATE Michigan	ZIP CODE 48101

FACILITY NAME
Engine Manufacturing Operation

b. FACILITY LOCATION
Same as Above

PARENT CORPORATION
Ford Motor Company

ADDRESS
The American Rd

CITY	STATE	ZIP CODE
Dearborn	Michigan	48124

c. WATER BODY PROTECTED
Reeck Drain which eventually empties into Ecorse River.

2. PURPOSE

INITIATION: [ ] Routine Surveillance [ ] Coast Guard Information
[X] Spill Report [ ] Citizen Information [ ] Other (specify):

TYPE: [ ] Plan Preparation [X] Plan Implementation
[ ] Follow-up [ ] Plan Amendment

3. INSPECTION

INDIVIDUAL CONTACTED	TITLE
Turner (Bud) L. Dorton	Technical Services
INDIVIDUAL CONTACTED N/A	TITLE

NOTIFICATION

B. SPCC INSPECTION SUMMARY SHEET (page 2 of 2)

4. FINDINGS

SOURCE IN APPARENT COMPLIANCE WITH SPCC REQUIREMENTS:

[X] Yes
- [ ] Have adequate plan
- [X] Not subject to regulations
  - [X] Insufficient storage
  - [ ] No reasonable spill expectation
- [ ] Plan fully implemented
- [ ] New facility operational for less than 6 months

[ ] No
- [ ] No plan
- [ ] Plan not properly certified
- [ ] Plan does not have management approval
- [ ] Plan not maintained at facility manned 8 hrs/day
- [ ] Inadequate plan (detailed SPCC Plan review attached)
- [ ] Plan not fully implemented
- [ ] Plan not reviewed within 3 years

[ ] Other

5. ATTACHMENTS
(None required if facility is in apparent compliance)

	NONE	ATTACHED	ALREADY ON FILE
*Detailed Observations	[ ]	[X]	[ ]
*Photographs	[X]	[ ]	[ ]
Slides	[X]	[ ]	[ ]
Map	[X]	[ ]	[ ]
*Field Drawing	[ ]	[X]	[ ]
*Comments	[ ]	[X]	[ ]
Telephone Conversations	[X]	[ ]	[ ]
*SPCC Plan	[X]	[ ]	[ ]

*(ALL REQUIRED IF FACILITY IS NOT IN APPARENT COMPLIANCE. If photos not permitted, check "None" and explain. Add "SPCC Plan" to List of Attachments when appropriate.)

FACILITY	DATE OF INSPECTION
Ford Motor Company, Engine Manufacturing Development Operation	April 19, 1994

1. FACILITY DESCRIPTION

1a. TYPE OF BUSINESS/OPERATION
Engine Manufacturing Research and Development

1b. FACILITY OIL STORAGE (All Tank Storage Underground)

!0,000 gallon Unleaded Fuel
12,000 gallon Waste Oil
3,000 gallon Test Coolant

Up to 100 small containers and drums stored in a small shed east of the building. The containers and their contents are removed for disposal within three days.

1c. PREVENTION MEASURES PROVIDED

Underground tanks are double walled and equipped with level sensors.

Drains out of the storage shed containment area go into the waste oil tank.

1d. APPEARANCE OF FACILITY (housekeeping)

Facility is clean and orderly.

1e. PAST SPILL HISTORY

Unknown

C. DETAILED SPCC DOCUMENTATION

2. RECEIVING WATER (should spill occur)

2a. NAME AND/OR DESCRIPTION

Reeck Drain which eventually empties into the north branch of the Ecorse River

[X] Perennial [ ] Intermittent
[X] Water present at time of inspection
[X] Inspector traced discharge to receiving water
[X] Inspector traced apparent drainage path to receiving water
[X] Receiving water identified by company representative
[X] Receiving water identified from topo map
[ ] Receiving water identified by other means (specify):

2b. PROBABLE FLOW PATH TO RECEIVING WATER
Across the paved parking area.

2c. CLIMATIC INFORMATION N\A

3. COMMENTS

Plan needs to be updated. Describes actions to be taken regarding PCBs generated on site. PCB compounds have been eliminated on the site. Jim Head advised that update was in progress.

Emergency phone numbers relating to the U.S. EPA are out of date or improperly identified.

Booms and other items used for spill containment are available on site but are not identified in the plan. Identified and unidentified containment equipment locations are not identified in the plan.

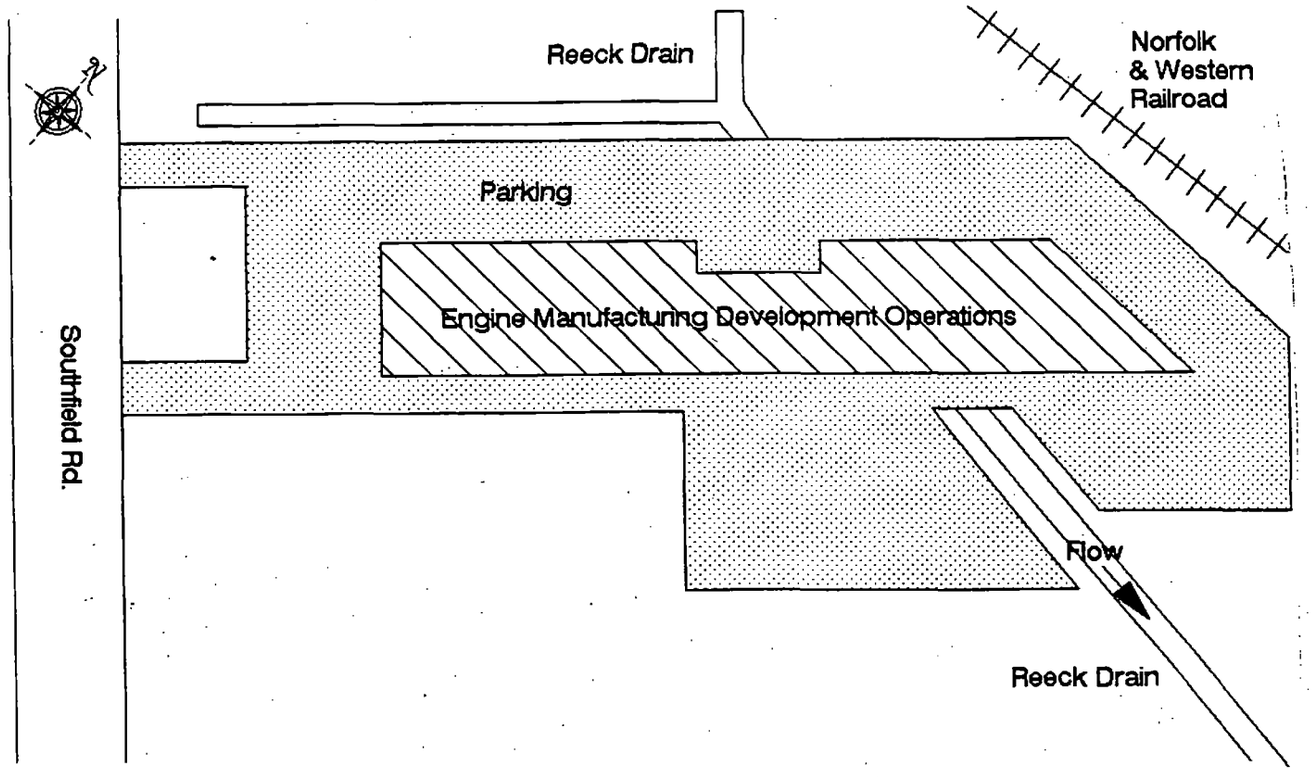
4. SPCC PLAN REVIEW

Overall layout of the plan and information provided are adequate.

5. SPCC AMENDMENT RECOMMENDATIONS (AMENDMENT INSPECTIONS ONLY)

C. DETAILED SPCC DOCUMENTATION

6. FIELD DRAWINGS (Attach more sheets if needed, and show north arrow of other orientation)



FACILITY	INSPECTION DATE
Ford Motor Company, Engine Manufacturing Development Operations	April 19, 1994
INSPECTOR	
Herbert Langer	